

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Chapter 7
Bky. No. 24-30167

Pro-Mark Services, Inc.,

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee of
Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark Services,
Inc. Employee Stock Ownership Plan, and as
Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Adv. No. 24-07014

Plaintiff,

**STIPULATED MOTION TO EXTEND
PLAINTIFF’S RESPONSE DEADLINE**

v.

Connie Berg, Kyle Berg, Connie Berg
Revocable Living Trust, Kyle R. Berg
Revocable Living Trust, Chad DuBois, and
Miguel Paredes,

Defendants.

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Second Amended Complaint against the Defendants, including Defendants Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, and Kyle R. Berg Revocable Living Trust (collectively, the “Berg Defendants”), on May 20, 2025 [ECF No. 120.]

2. The Berg Defendants filed their Answer to Trustee’s Second Amended Complaint, Affirmative Defenses, and Counterclaim on June 18, 2025 [ECF No. 127.]

3. On July 9, 2025, the Berg Defendants filed (i) a Motion to Redesignate the Counterclaim as an Affirmative Defense or, in the Alternative, Dismiss the Counterclaim [ECF No. 140] (the “Berg Motion”) and (ii) the Berg Defendant’s Amended Answer to Trustee’s Second Amended Complaint and Affirmative Defenses [ECF No. 142] (the “Berg Amended Answer”).

4. Due to scheduling issues, Plaintiff has requested that the Berg Defendants stipulate that Plaintiff’s response deadlines for the Berg Motion and Berg Amended Answer be extended to August 1, 2025. The Berg Defendants have no objection to this request.

5. Accordingly, Plaintiff and the Berg Defendants hereby move the Court, by stipulation, for an order setting August 1, 2025, as Plaintiff’s deadline to file a responsive pleading to the Berg Motion and Berg Amended Answer.

Dated: July 21, 2025

/s/ Peter D. Kieselbach
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Date: July 21, 2025

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Revocable Living Trust*

CERTIFICATE OF SERVICE

The undersigned certifies that on July 21, 2025, the above document was served on all counsel of record via CM/ECF.

/e/ Peter D. Kieselbach

Peter D. Kieselbach